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March 14, 2005

Food and Drug Administration  
Office of Nutritional Products, Labeling and Dietary Supplements  
(HFS-810)  
Center for Food Safety and Applied Nutrition  
5100 Paint Branch Pkwy  
College Park, MD 20740

MAR 23 2005

Dear Sir/Madam:

Notice is hereby given pursuant to the requirements of Section 403(b)(6) (21 U.S.C. 343 (b) (6) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that FoodScience Corporation and 20 New England Drive, Essex Junction, VT 05453 within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

TEXT OF CLAIM(S):

**"A High ORAC Blend, Antioxidant Supplement to Support Brain, heart, Liver, immune System Health and Energy Levels"**

NAME OF INGREDIENT(S) THAT IS SUBJECT OF CLAIM

Carrots	Nectarines	Papayas
Strawberries	Lecithin	Plums
Cherries	Inositol	Flax Seed
Red Raspberries	Blood Oranges	Arabinogalactan (Larch tree) Extract
ORAC Blend	DMG HCl	Apple Pectin
A proprietary blend of Green Tea Extract	Choline	Peaches
Grape Seed Extract, Apple, Blueberry,	L-Glutathione	Lycopene (Lyc-O-Mato® brand)
Broccoli, Cranberry, Kale, Orange, Prune,	Stevia	Lutein (FloraGLO® brand)
Raspberry, Spinach, and Strawberry.	Polygonum cuspidatum	Astaxanthin (Zanthin® Brand)
Acerola	Bilberry Extract	Pears
Pomegranates	Grape Seed Extract	Mangos
Cranberries	Acetyl-L-Carnitine	Watermelon
Blackberries	Phosphatidylserine	Red Currants
Blueberries	Milk Thistle Extract	

NAME OF SUPPLEMENT (INCLUDING BRAND NAME)

Davinci Laboratories of Vermont: Spectra Reds™  
Foodscience of Vermont: Superior Reds™

The undersigned certifies that the information contained in this notice is complete and accurate and that FoodScience Corporation has substantiation that the statements are truthful and not misleading.

Sincerely,

Lisa Gorman  
Quality Control Coordinator

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